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June 28, 2016

Via Email and U.S. Mail

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Re: Notice of Disclosure of Settlement Communications

Dear Counsel:

On April 14, 2016, CoCa Mines, Inc. ("CoCa"), filed suit against the Travelers Indemnity Company of Connecticut and related entities ("Travelers") in Federal District Court for the District of Colorado, asserting claims regarding certain Gilt Edge Site-related damages incurred by CoCa (the "Litigation"). A courtesy copy of that Complaint is attached.

Pursuant to the January 14, 2014 Confidentiality Agreement Among the United States, State of South Dakota, CoCa Mines, Inc., and Hecla Limited (f/k/a Hecla Mining Company) For Settlement Negotiations Related to the Gilt Edge Mine Superfund Site, and the July 27, 2010 Confidentiality Agreement Among the United States, State of South Dakota, Cyprus Mines Corporation, Cyprus Amax Minerals Company, Homestake Mining Company of California, Blue Tee Corporation and CoCa Mines, Inc. For Settlement Negotiations Related to the Gilt Edge Mine Superfund Site (the "Agreements"), CoCa hereby gives notice in accordance with Paragraph 9 of each of the Agreements, that CoCa intends to produce certain documents to

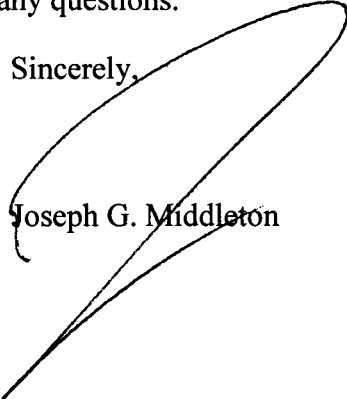
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Travelers which constitute Settlement Communications as defined in the Agreements. Disclosure of these materials is necessary under Federal Rule of Civil Procedure 26(a)(1) because they may be used to support CoCa's claims or defenses.

In accordance with Federal Rule of Procedure 26(c), CoCa is seeking a protective order from the court prohibiting Travelers' disclosure of any Settlement Communications to third parties or the public, and prohibiting use of Settlement Communications for any purpose unrelated to the Litigation. CoCa intends to withhold production of any Settlement Communications until the protective order has been entered by the court.

Please contact the undersigned with any questions.

Sincerely,



Joseph G. Middleton

JGM/gg
Enclosure